## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETES LED

		CIVIL ACTION NO. 04D-10994-NMG
PARENTS OF DANIELLE,	)	3. 12
Plaintifi	<b>)</b>	U.S. DISTRICI COURT
	)	ASSENIEED TO MOTION
<b>v.</b>	)	TO CONTINUE SCHEDULING
	)	<b>CONFERENCE FOR LEAVE</b>
MASS. DEPARTMENT OF	)	TO WITHDRAW
EDUCATION, ET AL.,	)	
Defenda	int )	

NOW COMES counsel for the plaintiff in the above-referenced action and respectfully requests that this Honorable Court grant a continuance of the scheduling conference set for February 10, 2005, at 3:00 p.m. to be heard March 31, 2005, at 3:45 p.m.

As reasons therefor, counsel states that due to recent health problems of a family member, she will be unable to adequately represent the plaintiff in this matter, and plaintiff has not yet retained successor counsel.

WHEREFORE, counsel moves this Court to continue the scheduling conference to allow time for the plaintiff to employ successor counsel.

Respectfully submitted,

PARENTS OF DANIELLE,

By their attorney,

ASSENTED TO:

Tammy Richardson, Esquire

Attorney for Sharon Public Schools

Deutsch/Williams

99 Summer Street

Boston, MA 02110

Amy Spector, Esquire

Attorney for State Defendants

Office of Attorney General

One Ashburton Place

Boston, MA 02108-1598

DATED: February 9, 2005

Ruth N. Bortzfield, Espline 462 Boston Street, Suite 3

Topsfield, MA 01983

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## **CERTIFICATE OF SERVICE**

I, Ruth N. Bortzfield, attorney for the plaintiff herein, hereby state that on February 9, 2005, I served a copy of Assented to Motion to Continue Scheduling Conference for Leave to Withdraw on the defendants by mailing the same, via first class mail, postage prepaid, to the following attorneys:

> Barry L. Mintzer, Esquire Tammy Richardson, Esquire Attorney for Sharon Public Schools Deutsch/Williams 99 Summer Street Boston, MA 02110

Amy Spector, Esquire Attorney for State Defendants Office of Attorney General One Ashburton Place Boston, MA 02108-1598